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July 30, 2012

Honorable A. Kathleen Tomlinson United States Magistrate Judge United States District Court Eastern District of New York 100 Federal Plaza P.O. Box 9014 Central Islip, New York 11722-9014

RE: In the Matter of the Complaint of Estate of

Theresa Maniaci-Canni et al.

CV-10-958 (AKT) Our file: 12/4007

LETTER MOTION

Dear Judge Tomlinson:

Our office is Admiralty Counsel to Gair Gair et.al attorneys of record for the Estate of Joseph Sugamele and Deborah Sugamele. We are not at this time acting for Block O'Toole & Murphy, counsel for the Soluri's.

Please accept this letter as a Motion requesting an extension of time to respond to the Motion seeking an Order directing the Soluri and Sugamele interests to share in certain disbursements occurred by Sullivan Papain et.al who represent Peter Sofia.

This request is made because we were retained to oppose this Motion until Thursday, July 26 and will need more time to prepare a proper opposition.

Mr. Floriani of Sullivan Papain has agreed to an extension of time for two weeks or until August 20^{th.} We suggest the time for Mr. Floriani to respond be extended to September 7, 2012.

Your favorable consideration of this request will be most appreciated.

Very truly yours,

MAHONEY & KEANE, LLP

Bv:

Cornelius A. Mahoney

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